

**KNIGHT
FIRST AMENDMENT
INSTITUTE**

at Columbia University

March 28, 2019

Via ECF and Email

The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

**Re: *Knight First Amendment Institute v. U.S. Department of
Homeland Security, et al., Case No. 17-CV-7572 (ALC)***

Dear Judge Carter:

The Knight First Amendment Institute at Columbia University (“Knight Institute”) respectfully submits this letter motion to request an enlargement of the page limit for summary judgment briefing. Defendants in this Freedom of Information Act (“FOIA”) matter consent to this request.

On February 15, 2019, the Court endorsed a schedule for two rounds of summary judgment briefing: the first addressing the adequacy of searches run by Immigration and Customs Enforcement (“ICE”) and the Department of Justice, Office of Legal Counsel (“OLC”), as well as the withholdings claimed by the Department of State (“DOS”) (with the final brief due on May 13, 2019); and the second addressing the withholdings claimed by the U.S. Citizenship and Immigration Service and ICE (with the final brief due on May 29, 2019). *See* ECF No. 87; *see also* ECF No. 94 (clarifying challenges that will be brought in first round of summary judgment briefing).

In light of the number of agencies and exemptions at issue in this litigation, the Knight Institute respectfully requests an enlargement of the page limit, from 25 pages to 35 pages, for both of its memoranda in support of its cross-motions for partial summary judgment and summary judgment and in opposition to Defendants’ motions. The Court has previously granted an extension of the same length to Defendants. *See* ECF No. 94.

This is the first request for an enlargement of the page limit from the Knight Institute, and as noted above, Defendants consent to this request. We thank the Court for its attention to this matter.

Respectfully,

/s/ Carrie DeCell

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cc: Ellen Blain, Esq. (via Email)